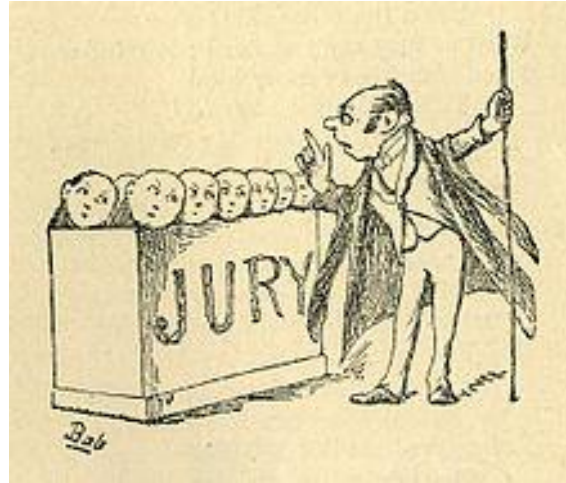


Ten Voir Dire Tips from Marion County Lawyers & Judges



1. **Develop a theme.** Reduce the theme of your case to a single sentence and ask questions around that theme.
2. **Be yourself.** Smile, be human, and show true emotions.
3. **Observe.** Pay close attention to jurors' body language, voice inflection, and reactions to other jurors' answers. Ask someone familiar with your case to attend voir dire and take notes on jurors.
4. **Acknowledge weak points.** Instead of hiding behind bad facts, think of a way to address them in voir dire to minimize their impact later in trial.
5. **Be flexible.** Create an outline with specific questions for jurors, but stray from your outline to explore jurors' responses to your questions.
6. **Be conversational.** Do not use legalese or other stiff, formal language.
7. **Look for the leader.** Try to identify leaders and followers amongst the jury pool. Identify those in the jury pool who will not work well with others.
8. **Ask open-ended questions.** To identify bias, get jurors to talk about themselves. Ask questions of the entire panel, followed by individual questions, depending on what you learn from the general questions.
9. **Be prepared.** Communicate with the court at pretrial about the seating arrangement for voir dire, and create a usable seating chart that contains the jurors' names as well as key information about the juror that you intend to use in voir dire.
10. **Listen.** Do not talk more than the jurors. Listen closely to the entirety of a juror's answer.